McKool Smith



October 18, 2024

By ECF

The Honorable Gabriel W. Gorenstein United States Magistrate Judge Southern District of New York 500 Pearl Street, Courtroom 6B New York, New York 10007-1312

MEMORANDUM ENDORSED

Re: Marc Restellini v. The Wildenstein Plattner Institute, Inc. 20 Civ. 4388 (AT) (GWG)

Dear Judge Gorenstein:

This is a joint letter submitted on behalf of all parties.

On June 28, 2024, the parties reported to the Court that they were making substantial progress towards a settlement agreement. At their request, the Court continued the stay of all deadlines and permitted the parties additional time to continue their settlement discussions. *See* ECF No. 178-179. The Court also adjourned *sine die* a conference that had been scheduled before it. ECF No. 180-181. Upon the parties' joint request, the Court extended the stay of deadlines through October 18. *See* ECF Nos. 183, 185.

The parties have made very substantial progress in drafting a settlement agreement. They have done so with the involvement of the mediator that they retained to facilitate their settlement discussions. The parties are close to having a final settlement agreement.

Accordingly, the parties jointly request that the Court continue the stay previously ordered until November 8, 2024, to permit the parties to finalize their settlement agreement.

Respectfully submitted,

PRYOR CASHMAN LLP

/s/ William L. Charron

By:

William L. Charron
Daniel V. Derby
Attorneys for Defendants
Wildenstein Plattner Institute, Inc. and
Fonds Wildenstein Plattner Institute France

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McKool Smith P.C.

/s/ Daniel W. Levy

By: Daniel W. Levy Eliza Beeney

Attorneys for Plaintiff Marc Restellini

Granted. Report due November 8, 2024.

So Ordered.

CABRIEL W. CORENSTEIN United States Magistrate Judge October 18, 2024